

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
LOUIS DREYFUS CORPORATION,

**08 CV. 1899 (DAB)**

Plaintiff,

- against -

**ANSWER TO  
CROSS-CLAIM**

MAERSK FREEMANTLE, her engines, boiler,  
tackle, etc., MS CONTESTE BERND  
BARTELS KG GMBH & CO., BERND  
BARTELS, A.P. MOLLER MAERSK A/S  
(MAERSK LINE), SAFEWAY TRUCKING  
CORPORATION and EAST COAST CES INC.,

Defendants.  
-----X

Defendant MS CONTESTE REEDEREI BERND BARTELS GMBH & Co. KG  
sued herein as MS Conteste Bernd Bartels KG GmbH & Co., for its Answer to the Cross-  
Claim of defendants Safeway Trucking Corporation and East Coast CES Inc. herein  
alleges upon information and belief as follows:

1. It denies each and every allegation of the Cross-Claim of defendants  
Safeway Trucking Corporation and East Coast CES Inc.

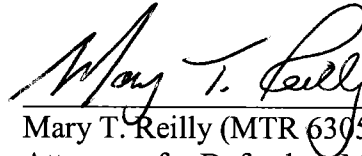
WHEREFORE, Defendant MS Conteste Reederei Bernd Bartels GmbH & Co.  
KG prays that the Cross-Claim of defendants Safeway Trucking Corporation and East  
Coast CES Inc. against it be dismissed, and that its Cross-Claim be granted, and that the

Court may grant any such other or further relief as may be just and proper.

Dated: New York, New York  
August 19, 2008

HILL, BETTS & NASH, LLP

By:

  
Mary T. Reilly (MTR 6305)  
Attorneys for Defendant MS  
Conteste Reederei Bernd Bartels  
GmbH & Co. KG  
One World Financial Center  
200 LIBERTY STREET, 26th Floor  
New York, New York 10281  
(212) 839-7000

To: Kingsley, Kingsley & Calkins  
Attorneys for Plaintiff  
91 West Cherry Street  
Hicksville, NY 11801  
Attention: Harold M. Kingsley, Esq.

Freehill, Hogan & Mahar, LLP  
Attorneys for Defendant AP Moller Maersk (Maersk Line)  
80 Pine Street  
New York, New York 10005  
Attention: James L. Ross, Esq.

Law Office of John P. Humphreys  
Attorneys for Defendants Safeway Trucking Corporation and  
East Coast CES Inc.  
3 Huntington Quadrangle, Suite 1028  
P.O. Box 9028  
Melville, NY 11747  
Attention: David L. Robinson, Esq.

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF NEW YORK    )

JOAN KARLSON, being duly sworn deposes and says, I am not a party to the action and over 18 years of age.

That on the 20th day of August 2008 she served the attached Answer to Cross-Claim of Defendants Safeway Trucking Corporation and East Coast CES Inc. upon:

Kingsley, Kingsley & Calkins  
Attorneys for Plaintiff  
91 West Cherry Street  
Hicksville, NY 11801  
Attention: Harold M. Kingsley,  
Esq.

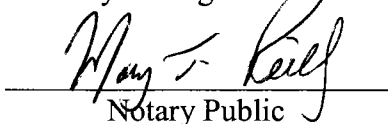
Freehill, Hogan & Mahar, LLP  
Attorneys for Defendant AP Moller  
Maersk (Maersk Line)  
80 Pine Street  
New York, New York 10005  
Attention: James L. Ross, Esq.

Law Office of John P. Humphreys  
Attorneys for Defendants Safeway  
Trucking Corporation and  
East Coast CES Inc.  
3 Huntington Quadrangle, Suite  
1028  
P.O. Box 9028  
Melville, NY 11747  
Attention: David L. Robinson, Esq.

by depositing a true copy of the papers, enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service, addressed to the foregoing attorneys.

  
JOAN KARLSON

Sworn to before me this  
20th day of August 2008

  
Notary Public

MARY T. REILLY  
Notary Public, State of New York  
No. 02RE6055119  
Qualified in Kings County 2-20-2011  
Commission Expires \_\_\_\_\_